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5 Attorneys for the United States  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 2019 MERCEDES-BENZ E63 AMG-S, VIN:  
WDDZF8KB8KA608709, CALIFORNIA  
15 LICENSE NUMBER 1UEV351,

16 APPROXIMATELY 0.041836 BITCOIN,

17 APPROXIMATELY 18.12902639 BITCOIN,

18 APPROXIMATELY 26.56443065 BITCOIN,

19 APPROXIMATELY \$1,712,611.00 IN U.S.  
CURRENCY,

20 ONE (1) BITCOIN CASASCIUS COIN,

21 ONE (1) CANADIAN GOLD COIN,

22 ONE (1) AMERICAN EAGLE GOLD COIN,

23 ONE (1) CUMMINS ALLISON MONEY  
COUNTER,

24 APPROXIMATELY \$3,050.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1301  
MACARTHUR BOULEVARD, OAKLAND,  
CALIFORNIA,

25 APPROXIMATELY \$51,590.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 395

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

1 BIRD AVENUE, SAN JOSE, CALIFORNIA,  
2 APPROXIMATELY \$2,475.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1310  
3 BROADWAY, OAKLAND, CALIFORNIA,  
4 APPROXIMATELY \$1,945.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1305  
5 N. BASCOM, SAN JOSE, CALIFORNIA,  
APPROXIMATELY \$20,090.00 SEIZED  
6 FROM LAMASSU BTM LOCATED AT 996  
PINE STREET, SAN FRANCISCO,  
7 CALIFORNIA,  
8 APPROXIMATELY \$3,115.00 SEIZED  
FROM LAMASSU BTM LOCATED AT  
9 25757 SOTO ROAD, HAYWARD,  
CALIFORNIA,  
10 APPROXIMATELY \$24,890.00 SEIZED  
11 FROM LAMASSU BTM LOCATED AT 1894  
UNIVERSITY AVENUE, BERKELEY,  
12 CALIFORNIA,  
13 APPROXIMATELY \$3,800.00 SEIZED  
14 FROM LAMASSU BTM LOCATED AT 7500  
COMMERCIAL BOULEVARD, COTATI,  
15 CALIFORNIA,  
16 APPROXIMATELY \$3,325.00 SEIZED  
17 FROM LAMASSU BTM LOCATED AT  
14701 SAN PABLO AVENUE, SAN PABLO,  
CALIFORNIA,  
18 APPROXIMATELY \$3,785.00 SEIZED  
19 FROM LAMASSU BTM LOCATED AT 3210  
BUSKIRK AVENUE, PLEASANT HILL,  
20 CALIFORNIA,  
21 APPROXIMATELY \$2,835.00 SEIZED  
22 FROM LAMASSU BTM LOCATED AT 605  
CONTRA COSTA BOULEVARD,  
CONCORD, CALIFORNIA,  
23 APPROXIMATELY \$6,480.00 SEIZED  
24 FROM LAMASSU BTM LOCATED AT 860  
ARDEN WAY, SACRAMENTO,  
CALIFORNIA,  
25 APPROXIMATELY \$22,660.00 SEIZED  
26 FROM LAMASSU BTM, LOCATED AT  
1151 GALLERIA BOULEVARD,  
ROSEVILLE, CALIFORNIA,  
27  
28

1 APPROXIMATELY \$14,805.00 SEIZED  
2 FROM LAMASSU BTM LOCATED AT 5127  
3 FRANKLIN BOULEVARD, SUITE 1,  
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED  
6 FROM LAMASSU BTM LOCATED AT 620  
7 W. CHARTER WAY, STOCKTON,  
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED  
10 FROM LAMASSU BTM LOCATED AT 4709  
FLORIN ROAD, SACRAMENTO,  
CALIFORNIA,

11 APPROXIMATELY \$6,125.00 SEIZED  
12 FROM LAMASSU BTM LOCATED AT 2221  
DEL PASO ROAD, SACRAMENTO,  
CALIFORNIA,

13 APPROXIMATELY \$130.00 SEIZED FROM  
14 LAMASSU BTM LOCATED AT 1744 N.  
TEXAS STREET, FAIRFIELD,  
CALIFORNIA, AND

15 APPROXIMATELY \$5,915.00 SEIZED  
16 FROM LAMASSU BTM LOCATED AT 400  
LINCOLN ROAD EAST, VALLEJO,  
CALIFORNIA,

17 Defendants.

18 It is hereby stipulated by and between the United States of America and potential claimants  
Rehan Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

19 1. On or about November 26, 2019, the Homeland Security Investigations and Federal  
20 Bureau of Investigation seized the above-referenced defendant assets pursuant to Federal seizure  
21 warrants (hereafter collectively “defendant assets”).

22 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required  
23 to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or  
24 obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of  
25 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
26 deadline is April 17, 2020.

27 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July  
28 16, 2020, the time in which the United States is required to file a civil complaint for forfeiture against

1 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
2 forfeiture.

3       4. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
5 alleging that the defendant assets are subject to forfeiture shall be extended to July 16, 2020.

6 Dated: 3/30/2020

McGREGOR W. SCOTT  
United States Attorney

8 By: /s/ Kevin C. Khasigian  
9 KEVIN C. KHASIGIAN  
10 Assistant U.S. Attorney

11 Dated: 3/20/2020

12 /s/ Thomas A. Johnson  
13 THOMAS A. JOHNSON  
14 Attorney for Potential Claimants  
Rehan and Rubina Alvi

(Signatures authorized by email)

15  
16 **IT IS SO ORDERED.**

17 Dated: \_\_\_\_\_

18 \_\_\_\_\_  
19 United States District Judge